

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Associated British Foods
Industry Apparel & Agricultural Products (Supply Chain and Own Operations)
Overall Score (*) 26.8 out of 100

Theme Score	Out of	For Theme
0.9	10	A. Governance and Policies
6.5	25	B. Embedding Respect and Human Rights Due Diligence
0.8	15	C. Remedies and Grievance Mechanisms
5.8	20	D. Performance: Company Human Rights Practices
11.3	20	E. Performance: Responses to Serious Allegations
1.6	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states in the Annual report that 'being part of Associated British Foods means being part of a community that respects human rights and celebrates diversity. We recognise the United Nations Guiding Principles on Business and aim to adhere to the core ILO conventions and all relevant laws relating to working conditions and employment'. It also indicates that 'while respecting all human rights throughout the business, six priority areas of focus to mitigate risk have been highlighted, namely: workplace safety; gender and diversity; slavery and human trafficking; supply chain; use of commodities; access to water'. [Annual report and accounts, 2017 & Modern slavery statement, 2017] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The company has indicated that it 'recognises the United Nations Guiding Principles on Business and Human Rights (UNGPs)' though it has not indicated it commits to respect the principles it outlines. [Annual report and accounts, 2017] • Not met: OECD

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: The Company has not published human rights policies which include explicit support for all of the core ILO labour areas. In its 2017 annual report, it states it 'aims to adhere to the core ILO conventions and all relevant laws relating to working conditions and employment' but it has not committed to respect these. [Annual report and accounts, 2017 & Additional disclosures to CHRB, 11/2016] • Not met: UNGC principles 3-6 • Met: All four ILO for AG suppliers: The supplier code contains a commitment to each ILO core. In relation to freedom of association and collective bargaining, the Company states that 'Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively'. [Supplier code of conduct] • Met: All four ILO for AP suppliers: The Primark code of conduct for suppliers contains a commitment to each ILO core. [Primark Supplier code of conduct] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: All four ILO Core: In a public submission to the CHRB The Company indicates the following: 'We respect the following internationally recognised labour rights: 1. Employment is freely chosen (meaning it is not forced or resulting from debt bondage) 2. Freedom of association and the right to collective bargaining are respected 3. Working conditions are safe and hygienic. 4. Child labour shall not be used. 5. Living wages are paid. 6. working hours are not excessive. 6. No discrimination is practised'. However, this is not part of a formal policy or public document approved by the board. • Met: Respect H&S of workers: The Company has a specific health and safety policy including commitment to 'providing a safe and healthy workplace to protect all employees, contractors, visitors and the public from foreseeable work hazards'. The policy contains a list of specific safety-related commitments. [Health and safety policy: abf.co.uk] • Met: H&S applies to AG suppliers: The supplier code contains requirements regarding health and safety [Supplier code of conduct] • Met: H&S applies to AP suppliers: The Primark supplier code contains requirements regarding health and safety [Primark Supplier code of conduct] • Not met: working hours for employees • Met: Working hours for AP suppliers: The Primark supplier code contains requirements regarding working hours [Primark Supplier code of conduct]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Respect land ownership and resources: One of the Company's subsidiaries, Illovo, has a land policy which includes a commitment to obtain FPIC and zero tolerance to land grabs. ABF also has a supplier policy in which it commits to 'adhering to the principle of free, prior and informed consent of all communities when acquiring land'. [Supplier code of conduct & Illovo guidelines on land and land rights: ilovosugarafrika.com] • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights: Although the supplier code contains a commitment to FPIC, no evidence found of expectations on water rights for suppliers. [Supplier code of conduct] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC for all: See above. [Illovo guidelines on land and land rights: ilovosugarafrika.com] • Met: Zero tolerance for land grabs: See above [Illovo guidelines on land and land rights: ilovosugarafrika.com] • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights: The Supplier code of conduct contains the following commitment: 'we adhere to the principle of free, prior and informed consent of all communities when acquiring land. The rights of communities and traditional peoples to maintain access to land and natural resources will be recognised and respected'. However, no evidence found in relation to the right to water. [Supplier code of conduct]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry -	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights • Not met: Children's rights • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
	people's rights (AG)		Score 2 <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: In a public submission to CHRB the Company states that: 'Our intention has always been to do the right thing for our people and the wider community. We nurture ethical business practices through the actions we undertake every day and, if we observe something is not right, we act quickly to correct it. We engage with a wide range of NGOs and campaigning organisations and, when our attention is drawn to an affected stakeholder group, we always seek to engage them directly to understand and remedy their concerns. We also undertake multi-stakeholder engagement. For instance, we choose to work with local NGOs and government organisations as well as organisations like the ETI to manage complex supply chain challenges'. However, in order to be considered, this information needs to be in a formal public document. In its reports the Company discloses stakeholder engagement, however, no evidence found of a commitment to engage in the context of human rights with affected stakeholders, including local communities. [Additional disclosures to CHRB, 11/2016 & Corporate responsibility update, 2017] • Not met: Regular stakeholder engagement: The Company only reports on its subsidiary, Illovo, strategies to engage with affected stakeholders on land issues around its operations but it does not have a public policy on engaging with affected stakeholders. [Corporate responsibility update, 2017] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts • Not met: Work with AP suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): In the public submission to the CHRB, the Company states that 'Associated British Foods does not tolerate threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations'. However, this statement needs to be in a formal public document and/or approved by the board in order to be considered as fit. [Additional disclosures to CHRB, 11/2016 & Corporate responsibility update, 2017] Score 2 <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments • Not met: Expects AP suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: CEO or Board approves policy: The Company does not have any formal policies related to human rights (or any human rights statement signed by the CEO). The ABF's Suppliers' code is not signed. The Company released a policy on Modern Slavery, signed by the Company Secretary. [Modern slavery statement, 2017] Not met: Board level responsibility for HRs Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs: On its website, the Company indicates that 'the chief executive of each business is required to submit an annual risk survey identifying all relevant risks for the business, including safety, environment and other CR issues' and 'finance directors also annually provide a report on progress against each business' identified CR priorities'. CR priorities explicitly include health and safety and human rights in the context of suppliers. However, this seem to be a subcompany level, whereas we look for group level discussion in Board meetings. [Our approach to CR: abf.co.uk & Our approach to CR - Priorities: abf.co.uk] Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key AG HR risk, beyond employee H&S Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior responsibility fo HR (inc ILO): On its website, approach to CR section, it is indicated that 'every division has a Corporate Responsibility (CR) lead and a Health, Safety and Environment (HSE) lead. The CR and HSE leads from the business meet regularly and are supported by the central CR and HSE teams within Associated British Foods. The 'Director of Legal Services and Company Secretary' is the Group Responsible for CR. However, the Company's policies don't not cover ILO declaration or UN Global Compact commitment at minimum. [Our approach to CR: abf.co.uk] Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for AG in supply chain Not met: Day-to-day responsibility for AP in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key AG HR risk, beyond employee H&S Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: HR part of enterprise risk system: Health and safety and supply chain's ethical business practices, including poor working conditions of workers are issues included in the Company's risk management system. In addition, the Company's statement on modern slavery includes risk assessment of modern slavery (which includes among others issues of forced labour, child labour, domestic servitude or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			human trafficking) in the supply chain and the Company's own hiring practices. [Modern slavery statement, 2017] Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Steps to communicate policy commitments to BRs: In a public submission to CHRB the Company states that 'Whenever any Associated British Foods business enters into a relationship with a supplier, the Supplier Code of Conduct is always included in our contractual terms. In some instances, our relationship with a supplier pre-date the creation of Supplier Code of Conduct, meaning they may not have a formal contract in place but they are certainly expected to abide by it'. [Supplier code of conduct & Additional disclosures to CHRB, 11/2016] • Met: Including to AG suppliers: The Code of conduct for suppliers states that 'suppliers and representatives should comply with and seek to develop relationships with their own supply chains consistent with the principles set out below and should be compliant with all local laws and the following principles as a minimum'. • Met: Including to AP suppliers: See above Score 2 • Met: How HR commitments made binding/contractual: As indicated in the submission to CHRB: the Supplier Code of Conduct is always included in our contractual terms. In some instances, our relationship with a supplier pre-date the creation of Supplier Code of Conduct, meaning they may not have a formal contract in place but they are certainly expected to abide by it'. [Additional disclosures to CHRB, 11/2016] • Not met: Including on AG suppliers: See above • Not met: Including on AP suppliers: See above
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Trains all workers on HR policy commitments: The Company does not have a policy which covers ILO standards or UN Global compact commitment (which is the minimum required to be assessed on this indicator). [Modern slavery statement, 2017 & Corporate responsibility update, 2017] • Not met: Trains relevant AG managers including procurement: In its 'Modern Slavery and Human Trafficking Statement' the Company indicates the following: 'In 2015, we trained our senior procurement team across all our business in the issue of modern slavery'. It also indicates that 'we are now expanding our training programme to the wider buying community including to those responsible for cleaning and catering, construction and refurbishment contracts'. The Company provides additional details on training in this policy. However, this modern slavery does not cover all ILO core areas. In its CR update 2017, the Company also reports that 'a major focus for the past year has been on training and learning. We recently conducted a group-wide awareness-raising training session, which was delivered to senior CR and procurement leads. We ensured the businesses were made aware of the scale, scope and pervasive risks of modern slavery and positioned the issue in the broader context of business and human rights, introducing the United Nations Guiding Principles on Business and Human Rights. It also enabled the sharing of best practice within the group and the awareness raising of the broader human rights agenda for business'. It has not indicated that this covered all ILO core areas and evidence seem to suggest that focus was in modern slavery-related issues. [Modern slavery statement, 2017 & Corporate responsibility update, 2017] • Not met: Trains relevant AP managers including procurement: See above Score 2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Monitoring implementation of HR policy commitments: The Company discloses details of how it monitors suppliers through audits and partnerships, and the code for suppliers include all ILO core. However, it has not indicated how it

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>monitors its own operations (monitoring in a policy which commits to ILO Declaration or UN Global Compact as a minimum). [Corporate responsibility update, 2017 & Supplier code of conduct]</p> <ul style="list-style-type: none"> • Met: Monitoring AG suppliers: See above • Met: Monitoring AP suppliers: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored • Not met: Discloses % of AP supply chain monitored
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects AG selection of suppliers: Although the Company engages with its business relationships in human rights issues, no evidence found in relation to how human rights is taken into account in the identification of selection of potential business relationships. • Not met: HR affects AP selection of suppliers • Met: HR affects on-going AG supplier relationships: In its suppliers' code of conduct the Company has indicated that 'in the event that we become aware of any actions or conditions not in compliance with the Code, we reserve the right to request corrective actions. ABF reserves the right to terminate an agreement with any supplier and representatives that does not comply with the Code'. • Met: HR affects on-going AP supplier relationships: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Met: Working with AG suppliers to improve performance: The explains how it works with suppliers stating: 'If there are any cases where our suppliers are found not to be meeting the expectations and standards laid out in our Supplier Code of Conduct, we work with them, offering training and support to help them improve. We only terminate commercial relationships with suppliers if no improvements are made over an agreed timeframe or there is no commitment to make them. In a number of cases, we have ensured that suppliers get further in-depth training and capacity building. Primark partnered with Verité to design a 'Fair Hiring Fair Labour' toolkit to identify human rights and compliance-related risks around hiring and recruitment practices. This toolkit has been used in factories and mills in our South Indian supply chain to assess the management practices of factories with particular reference to recruitment and hiring, screening and managing brokers, and on-site management of workers.' [Supplier code of conduct & Corporate responsibility update, 2017] • Met: Working with AP suppliers to improve performance: See above
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: In a public submission to CHRB the Company states that: 'We nurture ethical business practices through the actions we undertake every day and, if we observe something is not right, we act quickly to correct it. We engage with a wide range of NGOs and campaigning organisations and, when our attention is drawn to an affected stakeholder group, we always seek to engage them directly to understand and remedy their concerns. We also undertake multi-stakeholder engagement. For instance, we choose to work with local NGOs and government organisations as well as organisations like the ETI to manage complex supply chain challenges'. However, although Illovo does commit to engaging with all affected stakeholders when it acquires new land, no evidence found on the systems in place to systematically identify affected stakeholders, or frequency and triggers for engagement on human rights issues by type or stakeholders group. [Additional disclosures to CHRB, 11/2016] • Not met: Frequency and triggers for engagement • Not met: Workers in AG SC engaged • Not met: Communities in the AG SC engaged • Not met: Workers in AP SC engaged • Not met: Communities in the AP SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company stated that in its Corporate Sustainability Report Update 2015 that 'each business within the group engaged in the process of identifying and prioritising its CR issues upon which they will focus' and added 'we set out to identify the salient human rights risks which we would need to tackle as a group and the best way to manage the issues identified. We have highlighted the following six priority areas of focus to mitigate risk: H&S, Gender & diversity, Slavery & human trafficking, Supply chain, use of commodities, Access to water'. [Corporate responsibility update 2015, 2015] • Met: Identifying risks in AG suppliers: See above. • Met: Identifying risks in AP suppliers: See above. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): In the context of modern slavery & human trafficking, the Company discloses the following process: 'All our business have gone through a risk assessment process to understand which supply chains may be at higher risk of modern slavery. This may be due to the country of origin, the product or industry characteristics (such as seasonal lifecycles) or workforce characteristics (such as migrant workers)'. It also indicates that 'our current risk assessment is supplemented with access to Sedex and Maplecroft's risk assessment tools, which gives us an insight into some of our supply chains and suppliers with the highest risk'. It also indicates that 'the risk of modern slavery is not confined to our supply chains, we also scrutinise our own hiring practices'. [Modern slavery statement, 2017] • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including in AG supply chain • Not met: Including in AP supply chain <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers • Not met: Including AP suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company has a whistleblowing policy. It states that: 'This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, suppliers, casual and agency staff'. [Whistleblowing policy] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages: No evidence found of the Company making it clear that channel is available in all appropriate languages. [Whistleblowing policy] Not met: Expect AG supplier to have equivalent grievance systems Not met: Opens own system to AG supplier workers Not met: Expect AP supplier to have equivalent grievance systems Not met: Opens own system to AP supplier workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Grievance mechanism for community: In the context of whistleblowing, the Modern Slavery policy indicates that 'as a group, we encourage an open culture in all our dealings between employees and people with whom we come into contact'. 'Our whistleblowing policy sets out guidelines for individuals who wish to raise issues in confidence which could include forced labour concerns. We provide an external third party service for all staff, including casual or agency staff, and make every effort to protect the confidentiality of those who raise concerns'. In addition, Whistleblowing policy applies to, besides employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, suppliers, casual and agency staff'. However, it does not make clear whether all external individuals and communities who may be adversely impacted can raise concerns. [Modern slavery statement, 2017 & Whistleblowing policy] Score 2 <ul style="list-style-type: none"> Not met: Describes accessibility and local languages Not met: Expects AG supplier to have community grievance systems Not met: AG supplier communities use global system Not met: Expects AP supplier to have community grievance systems Not met: AP supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Engages users to create or assess system Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> Not met: Engages with users on system performance Not met: Provides user engagement example on performance Not met: AG suppliers consult users in creation or assessment Not met: AP suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Response timescales Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Public statement prohibiting retaliation Not met: Practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> Not met: Has not retaliated in practice Not met: Expects AG suppliers to prohibit retaliation Not met: Expects AP suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
	judicial grievance mechanisms		Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company indicates that a study co-commissioned by Twinings, Oxfam and ETP regarding wages in Malawi 'showed that they are often too low to afford a good standard of living'. Following this, 'Twinings is committed to working with others to create a competitive Malawian tea industry where workers earn a living wage and smallholders can thrive'. The programme 'aims to improve smallholders farming practices', it also 'aims to improve their wage-setting process through greater worker representation, support a healthier workforce through the provision of fortified meals and provide greater opportunities for women'. 'Although it is still in early days, a new quality-based pricing structure has meant that farmers are producing better, more valuable product than ever before'. However, this is an example of improving human rights performance rather than providing remedy to people that has been victim of a human rights breach due to the Company's operations. [Corporate Responsibility 2016, 2016] • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own agricultural operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe: Primark (a subsidiary of the company) is a founding member of ACT (Action, Collaboration, Transformation), an initiative involving international brands and retailers, manufacturers and trade unions to address the issue of living wages in the textile and garment supply. However, CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. [Corporate responsibility update, 2017] • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Paying living wage • Not met: Definition of living wage reviewed with unions
D.1.1.b	Living wage (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Living wage in supplier code or contracts: The Company has a suppliers' code of conduct in which it commits to paying living wages and states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives no comply with the code (similar commitment in Primark's supplier code). [Supplier code of conduct & Additional disclosures to CHRB, 11/2016] • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made
D.1.2	Aligning purchasing decisions with human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): The Company has only indicated that its subsidiary, Illovo, is taking initiatives such as sugar 'price guarantees' for suppliers and 'obtaining grant funding on behalf of outgrowers to develop new smallholder schemes or improve existing ones'. [Corporate responsibility update 2015, 2015] • Not met: Positive incentives to respect human rights (purchasing practices) Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields)

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			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why: The Company has disclosed the supplier map of Primark. However, no evidence found in relation to the agricultural supply chain. [Primark global sourcing map: primark.com]
D.1.4.a	Child labour: Age verification and corrective actions (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company indicates in its public submission to CHRB that 'In compliance with the relevant International Labour Organization (ILO) Standards, whenever any of our businesses hires a new employee we undertake age verification. If an applicant is below the legal working age, we would not employ them'. [Additional disclosures to CHRB, 11/2016] • Met: Age verification of applicants and workers: See above. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remediation if children identified
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: The Company has a suppliers' code of conduct in which it states that suppliers should not use child labour. Further guidelines include for suppliers to 'develop or participate and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child', avoiding night or hazardous work for children and young persons under 18 and compliance with 'the relevant International Labour Organization (ILO) standards'. It states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives no comply with the code. The Company states that the supplier code of conduct is always included in contractual terms whenever it enters into a relationship with a supplier. [Supplier code of conduct & Additional disclosures to CHRB, 11/2016] • Not met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.a	Forced labour: Debt bondage and other unacceptable financial costs (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Pays workers in full and on time: In its 2017 Modern Slavery Statement, the Company has indicated that 'Employment is freely chosen: There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.' However, no evidence found in relation to commitment to pay regularly, in full and on time. [Supplier code of conduct & Modern slavery statement, 2017] • Not met: Payslips show any legitimate deductions <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: It also states that in addition ' a number of individual businesses have created a tailored approach to tackle modern slavery. (...) within our Grocery division, some businesses are following the Stronger Together guidance to develop and enhance policy. Their Preventing Hidden Labour Exploitation policy specifies the measures taken to limit the possibility of hidden worker exploitation taking place at any site. It builds on current Human Resources (HR) practice, outlines training intent and requires suppliers to operate according to the same principle. Furthermore, other businesses are aiming to enhance policy to support the identification of root causes of modern slavery and to develop and improve grievance mechanisms for workers. Primark now includes mandatory confidential worker interviews as part of their audit protocol'. It also reported that 'some of our businesses, like Twinings, are also planning to conduct a workshop with local HR teams which will include specific guidance on recruitment practices, working with recruitment agencies and labour contractors. However, it is not clear whether to this day, the Company monitors in a general basis these financial practices, particularly regarding employment agencies and other recruitment intermediaries in its own operations. [Modern slavery statement, 2017]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Debt and fees rules in codes or contracts: The Company has indicated in its supplier code of conduct that 'there is no forced, bonded or involuntary prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice'. It states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives no comply with the code. The Company indicates that the supplier code of conduct is always included in its contractual terms whenever it enters into a relationship with a supplier. [Supplier code of conduct & Additional disclosures to CHRB, 11/2016] Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
D.1.5.c	Forced labour: Restrictions on workers (in own agricultural operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> Not met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.d	Forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: As indicated in previous indicators, the supplier code includes guidelines and requirements regarding freedom of movement: 'Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice'. [Supplier code of conduct] Not met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
D.1.6.a	Freedom of association and collective bargaining (in own agricultural operation)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation Not met: Discloses % covered by collective bargaining agreements Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: FoA & CB rules in codes or contracts: The Company indicates in its suppliers' code of conduct that 'workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers, representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. However, no evidence was found of guidelines containing requirements of prohibition of harassment and retaliation against union members and representatives. The Code for suppliers is part of contractual agreements. [Supplier code of conduct & Additional disclosures to CHRB, 11/2016] Not met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends in progress made
D.1.7.a	Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Injury Rate disclosures: The Company reports reportable injuries [Corporate responsibility update, 2017 & Corporate responsibility update 2015, 2015] Not met: Lost days or near miss disclosures Met: Fatalities disclosures: The Company reports fatalities [Corporate responsibility update, 2017 & Corporate responsibility update 2015, 2015]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: The Company reports fatalities and reportable injuries and provides an explanation of the figures provided. It has indicated its 'goals remain to eliminate fatalities and continuously improve our safety performance'. However, no specific evidence found in relation to targets related to injury/lost days/fatalities for the reporting period. [Corporate responsibility update, 2017] • Not met: Met targets or explains why not [Corporate responsibility update, 2017 & Corporate responsibility update 2015, 2015]
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The supplier code of conduct contains requirements on health and safety, including take steps to prevent accidents, receiving regular training, access to toilet facilities and clean water, establishing senior manager responsibility on health and safety within supplier operations. [Supplier code of conduct] • Not met: Injury Rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosure <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.1.8.a	Land rights: Land acquisition (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders [Supplier code of conduct & Illovo guidelines on land and land rights: ilovosugarafrika.com] • Not met: Approach to doing so if no recent land deals: The Company's subsidiary Illovo has developed Guidelines on Land and Land Rights, and a road map to implement these guidelines. It includes an assessment that seeks 'to identify current and potential problems that require further investigation or verification by an independent third party, as well as identifying potential interventions to resolve these issues'. Illovo 'engages in dialogue with affected stakeholders and works with them to ensure a satisfactory outcome for all parties. When acquiring new land, Illovo undertakes a thorough due diligence process which includes identifying legitimate tenure rights Holders'. However, no evidence found on the due diligence process, including details of the affected stakeholder engagement process in resettlement cases. [Illovo guidelines on land and land rights: ilovosugarafrika.com & Additional disclosures to CHRB, 11/2016] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent land deals
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on land & owners in codes or contracts: In its suppliers' Code of Conduct, the Company only refers to suppliers having to commit to free prior and informed consent for all but does not refer to the identification of legitimate tenure rights holders, with particular attention to vulnerable groups. Illovo's policy on land and land rights apply to suppliers. No evidence found, however, of the Company applying similar practices for all its relevant businesses. [Supplier code of conduct & Illovo guidelines on land and land rights: ilovosugarafrika.com] • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in the progress made
D.1.9.a	Water and sanitation (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks: The Company reports total water abstracted for use in its premises (26,7 million m3 in 2017) and for agricultural and other purposes and describes some of the actions it has put in place. In its Corporate Sustainability Report Update 2017, it has also indicated that it had in 2014, 'identified that a number of its sites are based in water stressed or water sensitive areas such as in India, Vietnam and California, USA' and that, in those areas, it 'pays particular attention to their water consumption and waste water management'.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			The Company, however, does not describe how it implements preventive and corrective actions in relation to the right to water and sanitation (although it provides safe drinking water and facilities in its sites and estates). [Corporate responsibility update, 2017 & Corporate Responsibility 2016, 2016] Score 2 <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress and shows trends in progress made
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts • Not met: How working with suppliers on water stewardship issues Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.1.10.a	Women's rights (in own agricultural operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence against women: The Company indicates that it has a gender diversity task force which includes representations from its divisions with the exception of Primark ('which has its own diversity and inclusion programme'). The purpose of the task force is to ensure that there are no barriers that prevent talented people from succeeding. The divisional CEO's are responsible for the work of the task force with accountability for ensuring delivery. However, the Company does not indicate whether this is applied and monitored throughout all levels of employment. [Corporate Responsibility 2016, 2016] • Not met: Working conditions take account of gender • Not met: Equality of opportunity at all levels of employment Score 2 <ul style="list-style-type: none"> • Not met: Meet all requirements under score 1
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts [Corporate responsibility update, 2017 & Corporate Responsibility 2016, 2016] • Not met: How working with suppliers on women's rights: However, it provides an example of training women smallholder farmers to improve yields as part of the Cotton Connect programme. The Company also indicated (2016 report) that it works, through Primark, in a partnership with the DFID (UK's department for international development) to improve health and wellbeing of local workers in five of Primark's major markets: Bangladesh, Pakistan, Myanmar, Ethiopia, and India. One of the key areas of work is women's economic empowerment: 'supporting the empowerment of women factory workers in global supply chains to eliminate issues surrounding health, housing, gender inequality, career progression and skills (vocational and life)'. However, it is not clear how this translates into improving supplier's practices in relation to women's rights. [Corporate Responsibility 2016, 2016 & Corporate Responsibility 2016, 2016] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Living wage in supplier code or contracts: The Company has a suppliers' code of conduct in which it commits to paying living wages and states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives not comply with the code (similar commitment in Primark's supplier code). [Supplier code of conduct & Additional disclosures to CHRB, 11/2016]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Improving living wage practices of suppliers: Primark and other retailers founded the ACT (Action, Collaboration, Transformation on Living Wages) initiative to provide a global framework on living wages in the garment sector. The initiative aims to improve wages in the global garment sector by establishing industry-wide collective bargaining in sourcing countries, supported by responsible purchasing practices'. 'Primark has publicly stated its commitment to purchasing practices supporting long-term partnerships with manufacturers, enabling and regarding their progress to paying living wages'. In 2017, the ACT (Primark's sourcing team are members of the ACT Working Group) piloted a tool to identify the purchasing practices that have the greatest impact on a living wage. The process has relied on the consultation and engagement with suppliers and other stakeholders. [Corporate responsibility update, 2017] Score 2 <ul style="list-style-type: none"> Met: Both requirements under score 1 met: as above Not met: Provide analysis of trends in progress made
D.2.2	Aligning purchasing decisions with human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Avoids business model pressure on HRs: The Company has only indicated that its subsidiary, Illovo, is taking initiatives such as sugar 'price guarantees' for suppliers and 'obtaining grant funding on behalf of outgrowers to develop new smallholder schemes or improve existing ones'. [Corporate responsibility update 2015, 2015] Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing the supply chain	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Identifies suppliers back to product source (farm, ranch etc): The Company has disclosed the supplier map of Primark. [Primark global sourcing map: primark.com] Score 2 <ul style="list-style-type: none"> Met: Discloses significant parts of supply chain and why: The Company has disclosed the supplier map of Primark. [Primark global sourcing map: primark.com]
D.2.4.b	Child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Child Labour rules in codes or contracts: Primark's code for supplies states that 'there shall be no recruitment of child labour'. 'Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child'. 'Children and young persons under 18 shall not be employed at night or in hazardous conditions'. No evidence found, however of guidelines in relation to age verification of job applicants and workers. [Primark Supplier code of conduct & Additional disclosures to CHRB, 11/2016] Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Debt and fees rules in codes or contracts: Primark's code for supplies states that 'there is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour'. 'Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice'. [Primark Supplier code of conduct & Additional disclosures to CHRB, 11/2016] Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.2.5.d	Forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: Primark's code for supplies states that 'there is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour'. 'Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice'. [Primark Supplier code of conduct]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: The Company indicates in its suppliers' code of conduct that 'workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers, representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. However, no evidence was found of guidelines containing requirements of prohibition of harassment and retaliation against union members and representatives. The Code for suppliers is part of contractual agreements. [Primark Supplier code of conduct & Additional disclosures to CHRB, 11/2016] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The supplier code of conduct contains requirements on health and safety, including take steps to prevent accidents, receiving regular training, access to toilet facilities and clean water, establishing senior manager responsibility on health and safety within supplier operations. [Primark Supplier code of conduct] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts [Corporate responsibility update, 2017 & Corporate Responsibility 2016, 2016] • Not met: How working with suppliers on women's rights [Corporate Responsibility 2016, 2016] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.2.9.b	Working hours (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Working hours in codes or contracts: Both ABF and its subsidiary, Primark (through which all apparel activities are undertaken), do have suppliers' code of conduct which includes not working beyond excessive hours and state that 'workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate'. It states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives no comply with the code. [Primark Supplier code of conduct & Supplier code of conduct] • Not met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Child labour in the supply chain • Headline: Child labour allegations at the Doomur Dullung tea estate in India • Sources: BBC, 08/09/2015 - bbc.com <p>CSR report 20and</p> <p>Supplier code of conduct</p> <ul style="list-style-type: none"> • Allegation: In September 2015, a joint investigation by BBC News and BBC Radio 4 made allegations of child labour at tea estates in India, including the Doomur Dullung estate. The estate is owned by the Assam Company which supplies Twinings - which is owned by Associated British Foods - as well as Yorkshire Tea, Harrods and Fortnum and Mason. One girl interviewed by the BBC investigators said that she was just 14 years old and was allegedly picking tea full-time. Two other children said they had been employed full-time on estates owned by Assam Company since their early teens.
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: Though the Ethical Tea Partnership (ETP) respond to the allegations in general, the Associated British Foods did not refer to ETP's comments and therefore do not meet CHRB indicator <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has a supply chain policy on child labour.
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has improved systems and engaged affected stakeholders: The Company reports that Twinings Ovaltine is an active member of the ETP and has two employees on ETP's board of directors. Through its ETP membership, Twinings Ovaltine also 'invests in an audit and remediation programme for its tea producers to ensure the sustainability of its supply chain.' However, it has not provided further details. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Land rights in own operations • Headline: Land grabbing allegations related to Illovo in Malawi (2008) • Sources: SOMO Report, December 2015 - somo.nl <p>BBC News, 17/12/2014 - bbc.com</p> <p>Malawi Case Study – Landesa, October 2015 - landesa.org</p> <p>Illovo public statement, December 2015 - illovosugar.co.za , ABF website, 29/04/2016,</p> <p>Illovo website, 29/04/2016;</p> <p>Submission to the CHRB Disclosure Platform: 'Additional Disclosures November 2016</p> <ul style="list-style-type: none"> • Allegation: Associated British Foods (ABF) owns 51% of Illovo Sugar Malawi Limited (ISML or Illovo). In December 2015, a report by the Centre for Research on Multinational Corporations (SOMO) entitled 'Bittersweet: Sustainability Issues in the Sugar Cane Supply Chain' alleged that communities surrounding Illovo sugar plantations in Malawi had been forced from their land in 2008. In its report, SOMO focussed on the people of Chipakuza and Thom Villages in Chikwawa District. It alleged these communities 'accuse Illovo Malawi of land grabbing. The people of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			these two villages claimed that, in 2008, Illovo Malawi forced the people out of their customary land that was being used for subsistence farming’.
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: Illovo responded to the SOMO report in December 2015 in a public statement. The company said that ‘Illovo Malawi recognises that land is an extremely contentious issue across the country, particularly in the Nchalo and Dwangwa areas, and the company has not been involved in any land grabs. The Illovo group acquired a majority shareholding in Lonrho Sugar Corporation Limited (“Lonrho”) in 1997 and since that time, Illovo has not expanded its land holdings beyond the areas that were leased to Lonrho in the 1970s’. <p>Illovo further indicates that ‘ISML does not own any land in Malawi – it has long-term legitimate leases for the land it uses, which were granted to Lonrho by the government in the 1970s. Accordingly, the allegations that Illovo has grabbed land in the SOMO report are false’.”</p>
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has global policies related to land rights for its own agricultural operations through its subsidiary Illovo (which maintains its own agricultural operations). Illovo has a separate land policy which includes a commitment to obtain FPIC and states that Illovo ‘adopts a zero tolerance approach to land grabs and requires that all its Suppliers do likewise’. Its supplier code of conduct also states that it ‘adheres to the principle of free, prior and informed consent of all communities when acquiring land’.
E(2).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: In its November 2016 additional submission to CHRB, the Company indicated, among other things, that Illovo has a due diligence system to identify affected stakeholders and engages in a dialogue with affected stakeholders. • Met: Encourages linked business to engage affected stakeholders • Met: Provides remedies to affected stakeholders: In its reaction to the draft findings of SOMO’s report presented to the company, the company shared the lease document and produced a map of the area of the plantation bordering Thom village. For the lists of villagers compensated in 1974 and 2008, Illovo referred to the District officer. The company also noted that the compensation paid to affected villagers in 2008 amounted to MK 4,788,200 (EUR 21,589). This constituted compensation for loss of crops not for loss of land or income, as the company claims that the affected villagers had illegally occupied the land. • Met: Has reviewed management systems to prevent recurrence: According to the same report, in March 2015, the company adopted guidelines on land and land rights for which a road map for Malawi is being developed. A participatory boundary retracement of the Nchalo estate was initiated in 2014. The company said in a press release that the SOMO report does not reflect the company’s approach to the local communities and that the land grabbing practices alleged in the report do not reflect the company’s approach towards local productive land. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.61 out of 4	Out of a total of 62 indicators assessed under sections A-D of the benchmark, Associated British Foods made data public that met one or more elements of the methodology in 25 cases, leading to a disclosure score of 1.61 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Company reports on GRI

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	<p>Associated British Foods met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.1.1.a : Living wage (in own agricultural operations) • Not met: Score 2 for D.1.7.a : Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote

continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.